FORSF 11.3258 NW3 7/24/00

Oregon

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July 24, 2000

Matt Cusma
Schnitzer Steel Industries
P.O. Box 10047
Portland, Oregon 97296-0047

RE: Crawford Street Corporation Site
8424 and 8524 N. Crawford Street, Portland, Oregon
Revised Preliminary Assessment

Dear Mr. Cusma:

Thank you for submitting the June 14, 2000 revised Preliminary Assessment (PA) of the above-referenced site. As discussed during our meeting on July 7, 2000, the Oregon Department of Environmental Quality (DEQ) appreciates the revisions made to the PA, however, DEQ believes that additional sampling is necessary to meet the objectives of the PA. In particular, the sampling must be adequate to determine whether a current source and pathway for Willamette River contamination exists at the Crawford Street Corporation (CSC) site. Regardless of whether CSC is ultimately responsible for contamination that did not originate on the CSC property, CSC is still responsible for demonstrating to DEQ that this is the case (i.e., that the contamination did originate off-site). In addition, should it be necessary to collect off-site samples in order to meet the needs of the investigation, DEQ expects that CSC will make every reasonable effort to obtain that access.

North Area

- It appears that proposed surface soil samples SS-2 through SS-7 are located off site on City of Portland property. The objective of these samples is to evaluate potential contaminant migration via surface water flow from the north portion of the subject property. If the objective of these samples can be met through the collection of samples on the CSC property, modified sample locations should be proposed. During our recent meeting it appeared that samples could be collected on the subject property from the vicinity of at least SS-1, -6, and maybe -4. However, in some cases the collection of samples on City of Portland property may be necessary.

South Area

- Soil/sediment samples should be collected from beneath the two eight-inch pipes located near the riverbank to evaluate potential historic discharges. Analyses should include polycyclic aromatic hydrocarbons (PAH), volatile organic compounds (VOC), and metals. Although it is not clear what these outfalls were used for, the

outfalls represent a significant contaminant migration pathway that requires characterization.

- Subsurface soil and groundwater samples should be collected near the riverbank downgradient (south) of the three primary potential historical source areas: 1) 1969 sawmill and planing mill and 1911 and 1924 planing mill; 2) 1905 sawmill and 1924 Woolen Mills warehouse; and 3) 1924 foundry, machine shop, pattern shop, and coke storage and associated septic tank drainfield. Such data is necessary to determine if these historic source areas represent a current or past source of Willamette River contamination. Soil cores should be observed continuously and sampled at the most contaminated interval based on visual observation and PID/FID field screening. Analytes should include VOC and PAH at each location plus metals downgradient from the foundry.

- Soil sample SS-8 in the black sand should be collected in the subsurface interval that appears most contaminated based on visual observation and PID/FID field screening. Additional analytes (from those proposed for SS-8 and SS-9) should include total and TCLP cadmium and chromium and polychlorinated biphenyls to evaluate contaminants often associated with petroleum tank cleaning.

DEQ does not expect the PA to be revised, and looks forward to a revised sampling plan in letter format by August 11, 2000. Please call me if you have questions.

Sincerely,

Tom Gainer, P.E.
Project Manager

cc: Ross Rieke, Bridgewater Group
Rod Struck, DEQ/NWR
Eric Blischke, DEQ/NWR